

EXHIBIT A

Technical Exhibit of duTreil, Lundin & **Rackley**, P.C.

TECHNICAL EXHIBIT
AMENDMENT TO
PETITION FOR RULE MAKING

Technical Narrative

This Technical Exhibit, of which this Narrative is part, proposes to amend a Petition for Rule Making to modify the Commission's FM Table of Allotments contained within Section 73.202 within the Commission's Rules. On March 18 2002, a Petition for Rule Making was filed to:

- Delete Channel 239C1 at Tuscaloosa, Alabama and allot Channel 239C2 at Midfield, Alabama.
- Delete Channel 237A at Cordova and allot Channel 237A at Coaling, Alabama.
- Delete Channel 238A at Holly Pond and allot Channel 238A at Hackleburg, Alabama.
- Delete Channel 245C at Decatur, Alabama and allot Channel 245C at Holly Pond, Alabama.
- Delete Channel 223A at Dora and allot Channel 223A to Cordova.

This amendment solely seeks to add three components to the above scenario. No changes are being made to the reference site coordinates, city of license or channels proposed in the March 18, 2002 Petition for Rule Making.

Proposed Channel 238A Hobson City, Alabama

It is proposed to delete Channel 238A at Ashland, Alabama and allot Channel 238A to Hobson City, Alabama. The Hobson City proposal is mutually **exclusive** with the current Ashland allotment. There is one existing aural service in Hobson City, WHOG(AM) on 1120 kHz; however, this is a daytime only facility. The proposed Hobson City allotment **will** be the first full-time aural

service assigned to Hobson City. It is proposed, as discussed below, to allot another channel to Ashland. Therefore, Ashland would maintain its two aural services, including a vacant allotment for Channel 264A.

The existing 70 dBu contour of Channel 238A at Ashland does not encompass any **U.S.** Census defined urbanized area. The proposed 70 dBu contour of Channel 238A at Hobson City encompasses 56 square kilometers, or 28%, of the Anniston urbanized area and 19,000 persons, or 25%, of the Anniston urbanized area population.

The attached Sheet 1 of Figure 2 is a tabulation of the required separations pertinent to the use of Channel 238A at Hobson City. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments, except for Channel WFMH-FM on Channel 238A at Holly Pond. It is proposed in this Rule Making petition to reallocate WFMH-FM to another city of license. Therefore, WFMH-FM is not an allocation issue. Operation from the reference site identified below will provide the requisite city grade signal to all of Hobson City. Sheet 2 of Figure 2 is a coverage map showing the 70 dBu contour and the city limits of Hobson City.

Below are the Channel 238A Hobson City reference site geographic coordinates:

33° 29' 30" North Latitude
85° 52' 55" West Longitude

The town of Hobson City has a population of 878 persons. The Anniston urbanized area encompasses 33 percent of the Hobson City area and 70% of the Hobson City population.

The Channel 238A service gain area would contain 87,500 persons over an area of 1,130 square kilometers. The loss area would contain 6,300 persons over 1,130 square kilometers. The total proposed Channel 238A 60 dBu service area would contain 113,000 persons over 2,460 square kilometers as compared to the existing Channel 238A 60 dBu service area containing 31,800 persons over 2,460 square kilometers.

The other aural services that would serve the Channel 238A loss area are provided in Sheet 4 of Figure 2. A cumulative portion of the loss area of 410 square kilometers containing 3,400 persons would have three remaining aural services; a cumulative portion of the loss area of 330 square kilometers containing 1,800 persons would have four remaining aural services. No persons in the loss area will receive less than three aural services.¹

Furthermore, the Ashland replacement Channel 252A facility (discussed below), will serve 1,000 square kilometers, or 88 percent, and 5,900 persons, or 93 percent, of the Channel 238A loss area. The replacement facility will serve 360 square kilometers, or 88 percent, and 3,200 persons, or 94 percent of the Channel 238A loss area that would have three remaining services. The replacement facility will serve 320 square kilometers, or 94 percent, and 1,700 persons, or 97 percent of the Channel 238A loss area that would have four remaining services.

¹ A small portion of the Channel 238A loss area (less than 1 square kilometer) would have only 2 aural services. However, no populations centroids are located within this area.

Proposed Channel 252A Ashland, Alabama

It is proposed to delete Channel 252A at Sylacauga, Alabama and allot Channel 252A to Ashland, Alabama. This Ashland proposal is mutually exclusive with the current Sylacauga allotment. This allotment to Ashland will replace Channel 238A at Ashland, thus ensuring that Ashland retains its sole local FM operating service. Sylacauga would have two aural services remaining, daytime station WYEA(AM) on 1290 kilohertz and full-time station WFEB(AM) on 1340 kilohertz.

Neither the existing nor the proposed 70 dBu contour of Channel 252A at Sylacauga or Ashland encompasses any U.S. Census defined urbanized area.

The attached Sheet 1 of Figure 3 is a tabulation of the required separations pertinent to the use of Channel 252A at Ashland. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments, except for WSB-FM on Channel 253C at Atlanta, Georgia. It is proposed in this amended Rule Making petition to reclassify WSB-FM to a Class CO from a Class C. Therefore, WSB-FM is not an allocation issue. Operation from the reference site identified below will provide the requisite city grade signal to all of Ashland. Sheet 2 of Figure 3 is a coverage map showing the 70 dBu contour and the city limits of Ashland.

Below are the Channel 252A Ashland reference site geographic coordinates:

33° 15' 45" North Latitude
85° 54' 00" West Longitude

The Channel 252A service gain area would contain 28,500 persons over an area of 1,700 square kilometers. The loss area would contain 51,500 persons over 1,700 kilometers. The total proposed Channel 252A 60 dBu service area would contain 34,000 persons over 2,460 square kilometers as compared to the existing Channel 252A 60 dBu service area containing 57,500 persons over 2,460 square kilometers.

The other aural services that would serve the Channel 252A loss area are provided in Sheet 4 of Figure 3. A portion of the loss area of 30 square kilometers containing 500 persons would have only two remaining aural services, this is 2 percent and 1 percent of the Channel 252A loss area and population, respectively. No persons in the loss area will receive less than two aural services.²

Proposed Channel 253C0 Atlanta, Georgia

It is proposed to reclassify WSB-FM on Channel 253C at Atlanta, Georgia to a Class C0 facility. Since WSB-FM's licensed antenna height above average terrain is less than 451 meters, it is eligible to be reclassified as a Class C0 with no facility modification necessary.

No change in site reference coordinates is proposed. Therefore, no loss or gain areas are created. The Class C0 facility will continue to provide the requisite 70 dBu coverage over its principal community. Also, Channel 253C0 would be fully-spaced to all pertinent allotments and stations at the reference site.

² For the other services analysis, the coverage of Class C and Class C0 facilities were determined based upon their operating HAAT. However, if the respective maximum Class C0 and new minimum Class C reference distances were used for the stations, in particular WHHY-FM, WLWI-FM and WMKS-FM in Montgomery, then the entire Channel 2528 loss area could be considered as served by 5 or more services.

Below are the Channel 253C0 Atlanta, Georgia
reference site geographic coordinates:

33° 45' 33" North Latitude
84° 20' 05" West Longitude

WSB-FM on Channel 253C0 will continue to serve
4,170,000 persons over 16,730 square kilometers.

Proposed Modifications to Table of Allotments

This proposal provides for the following
allotment changes to Section 73.202, The Commission's
Table of FM Allotments.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Midfield, AL	---	239C2
Tuscaloosa, AL	225C1, 239C1, 288A	225C1, 288A
Ashland, AL	<u>238A</u> , 264A	<u>252A</u> , 264A
Sylacauga, AL	252A	--
Hobson City, AL	---	238A
Atlanta, GA	225C1, 235C1, 241C <u>253C</u> , 259C, 277C	225C1, 235C1, 241C <u>253C0</u> , 259C, 277C
Cordova, AL	237A	223A
Coaling, AL	---	237A
Holly Pond, AL	238A	245C
Hackleburg, AL	---	238A
Decatur, AL	245C, 271C1	271C1
Dora, AL	223A	--

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November 20. 2002

Figure 1

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Summary of 60 dBu Service Gain/Loss Analysis

Allotment	Loss Area (km ²)	Gain Area (km ²)	Loss Population	Gain Population
Tuscaloosa, AL	9,600	---	202,000	---
Midfield, AL	---	1,800	---	203,000
Ashland, AL	1,130	1,700	6,300	28,500
Hobson City, AL	---	1,130	---	87,500
Sylacauga, AL	1,700	---	51,500	---
Cordova, AL	2,460	---	81,000	---
Coaling, AL	---	2,460	---	149,000
Holly Pond, AL	2,460	----	100,000	---
Hackleburg, AL	----	2,460	----	41,100
Total:	17,350	9,550	440,800	509,100

The proposal would have a "net" gain of 68,300 persons and a "net" loss of 7,800 square kilometers.

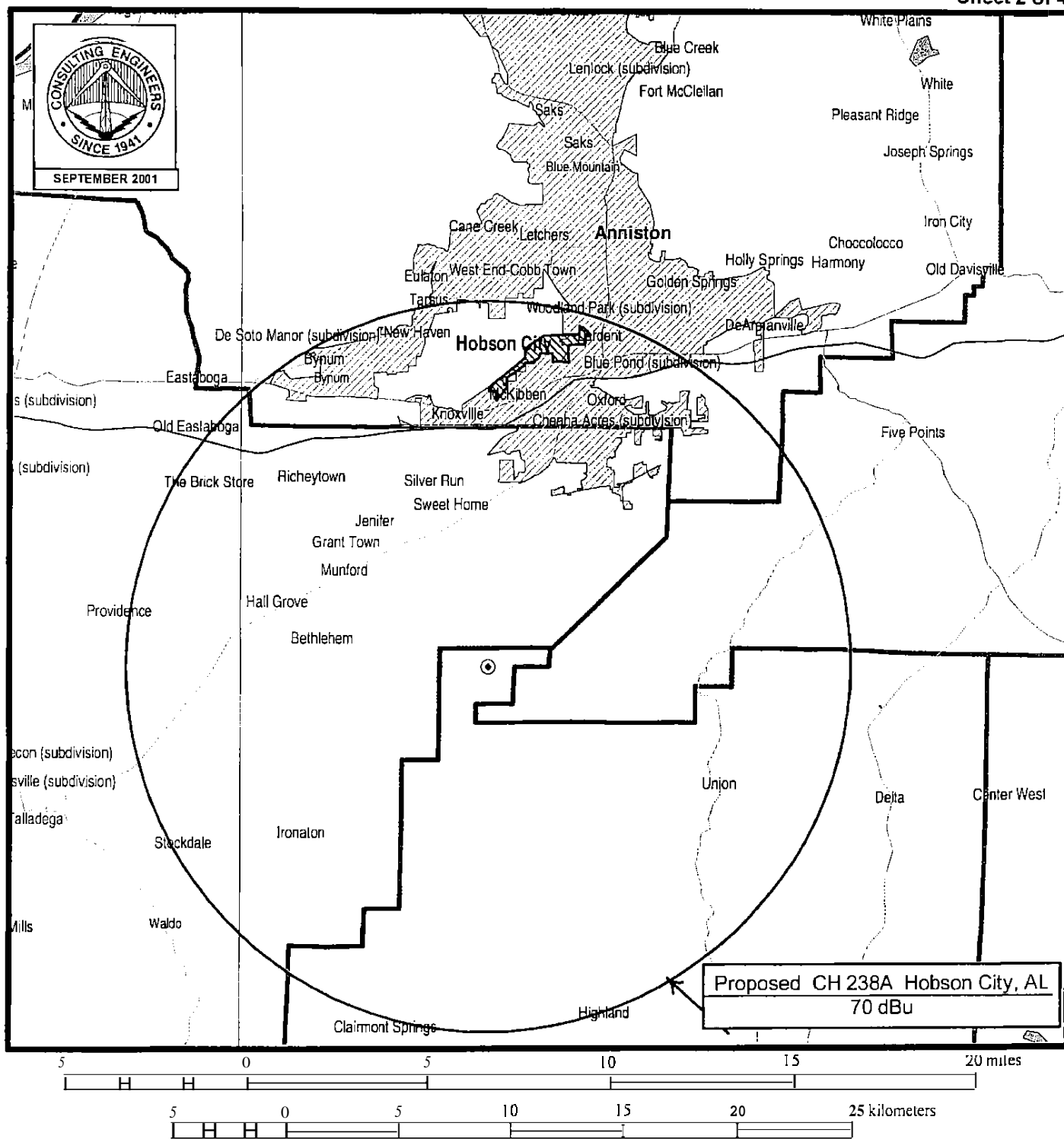
Note: Population based upon 2000 Census.

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Channel 238A-Hobson City, Alabama Allocation Study

33° 29' 30" North Latitude
85° 52' 55" West Longitude

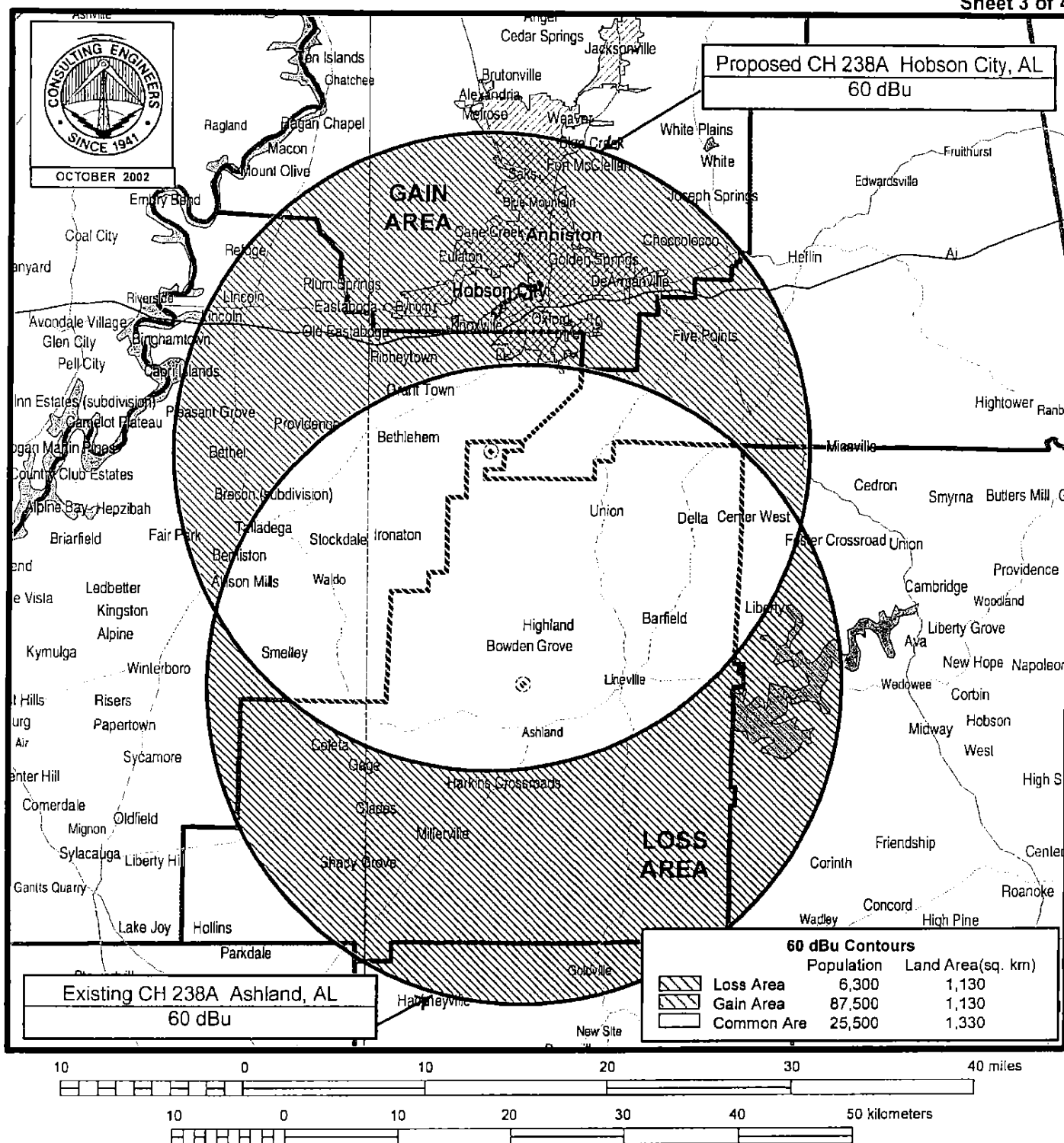
Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
DWSRM 30623	COOSA GA CP	BPH C 19900226MD	237A 95.3	3 100	N 34-11-41 085-20-55	N 55.6	71.98	72.0
WASZ 52320	ASHLAND AL LIC	BLH C 19950621KA	238A 95.5	1.7 188	N 33-18-30 085-50-58	N 167.0	59.45	115.0
<i>[Subject station of amendment. No allocation concern]</i>								
WFMH-F 24578	HOLLY POND AL LIC	BLH C 19991109ACC	238A 95.5	6 100 28292	Y 34-06-16 086-41-47	N 295.4	71.71	115.0
<i>Proposed to delete Channel 238A at Holly Pond. No allocation concern.]</i>								
WBTS 11710	ATHENS GA LIC	BLH C 20011016AAF	238C1 95.5	74 340	N 34-07-32 083-51-32	N 79.9	199.97	200.0
WATG 67769	TRION GA LIC	BLH C 19961009KB	239A 95.7	1.3 213	N 34-28-10 085-17-48	Y 41.9	95.67	72.0
0	MIDFIELD AL ADD	RM C bg-99	239C2 95.7		33-24-50 087-01-05	244.3	105.70	106.0
WBHJ 730	TUSCALOOSA AL LIC	BLH C 19950411KA	239C1 95.7	100 299	N 33-05-38 087-15-15	Y 235.3	142.86	133.0
WTWX-F 25674	GUNTERSVILL AL LIC	BLH C 19950712KC	240C3 95.9	10 157	N 34-20-14 086-16-46	N 335.0	62.08	42.0



PROPOSED HOBSON CITY 70 dBu COVERAGE CONTOUR

PETITION FOR RULE MAKING

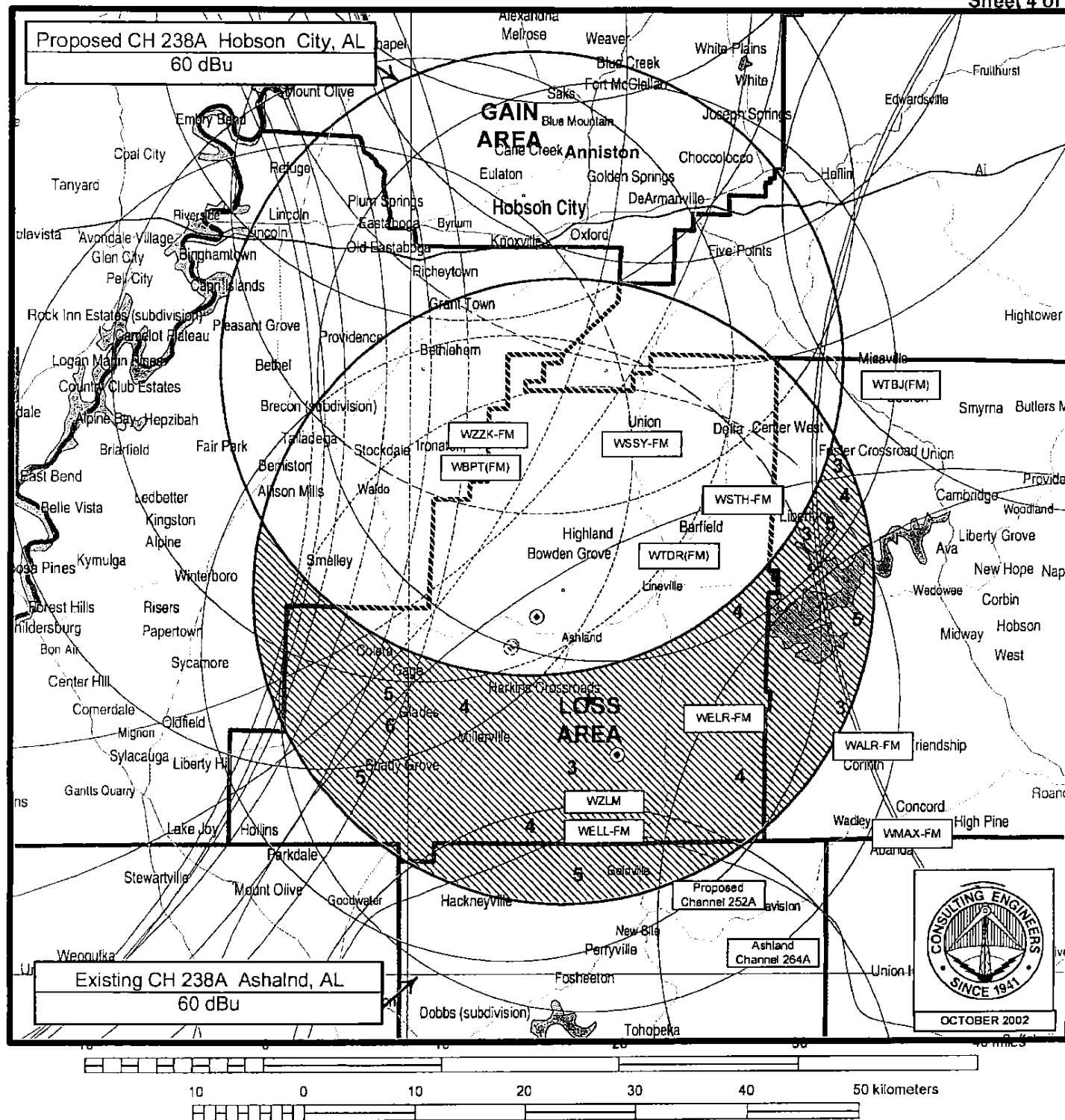
du Treil, Lundin & Rackley, Inc., Sarasota, Florida



ASHLAND/HOBSON CITY GAIN/LOSS AREA

PETITION FOR RULE MAKING

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ASHLAND/HOBSON CITY LOSS AREA OTHER SERVICES

PETITION FOR RULE MAKING

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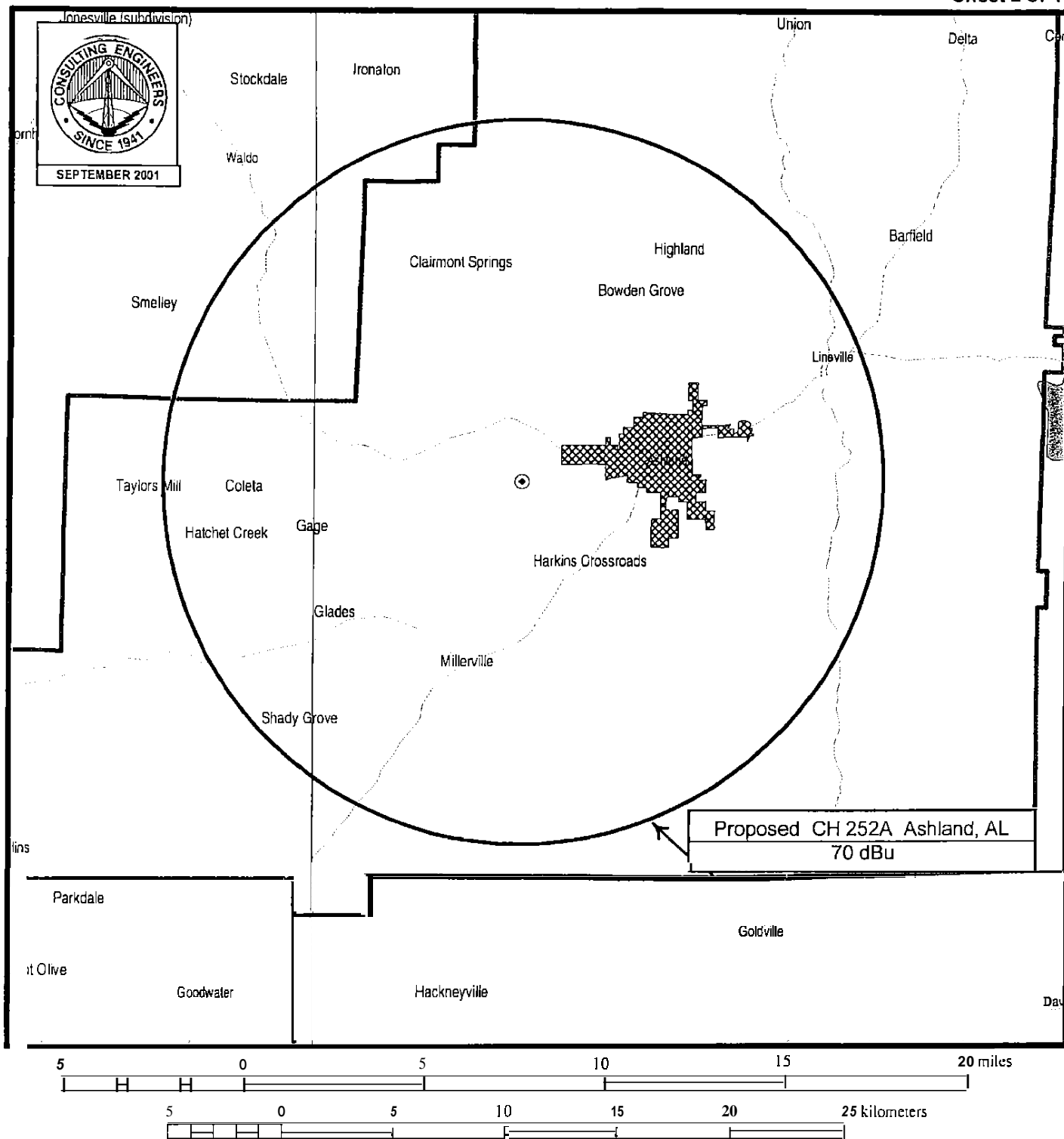
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Channel 252A Ashland, Alabama Allocation Study

33° 15' 45" North Latitude

85° 54' 00" West Longitude

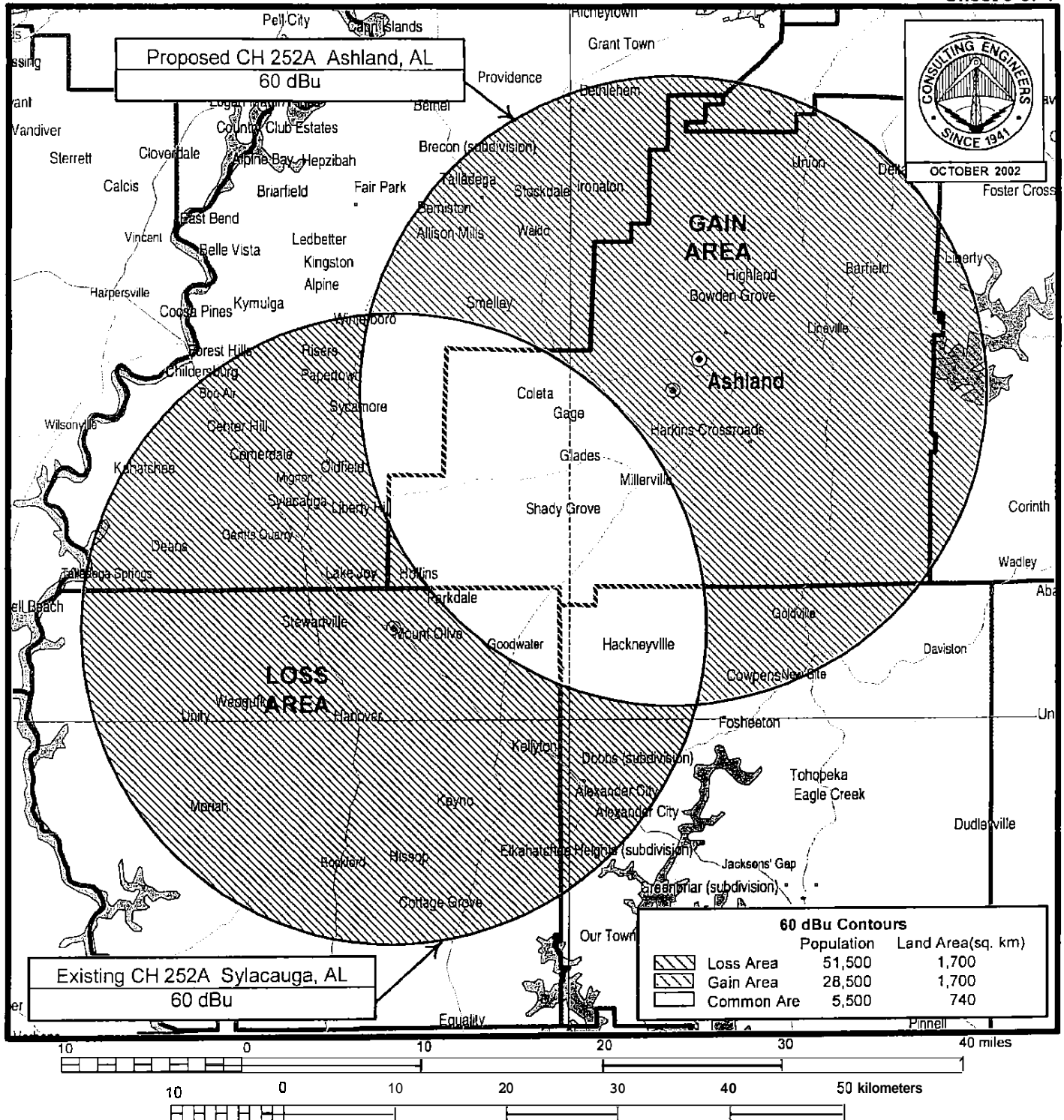
Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WVOK-F 73609	OXFORD AL	BLH LIC C 20010406AAJ	250A 97.9	0.51 338	33-37-20 085-52-19	N 3.7	39.98	31.0
WMGP 39619	HOGANSVILLE GA	BLH LIC C 19990927AAJ	251C3 98.1	25 Y 100 15207	33-03-54 084-57-23	N 103.8	90.71	89.0
WTRB-F 704	SYLACAUGA AL	BLH LIC C 20020523AAM	252A 98.3	2.25 N 166	33-04-23 086-10-06	N 229.9	32.68	115.0
[Subject station of amendment. No allocation concern]								
WAGH 43093	FORT MITCHE AL	BLH LIC C 19930601KE	252A 98.3	6 N 100	32-21-48 085-03-06	N 141.4	127.50	115.0
WSB-FM 73978	ATLANTA GA	BLH LIC C 19980903KB	253C 98.5	100 N 313	33-45-33 084-20-05	N 68.7	155.52	
[WSB-FM is proposing Class C0 with no site change. Therefore, no allocation issue.]								
WBHK 65227	WARRIOR AL	BPH CP C 20010808AAT	254C1 98.7	39 N 408	33-29-04 086-48-25	Y 286.6	87.92	75.0

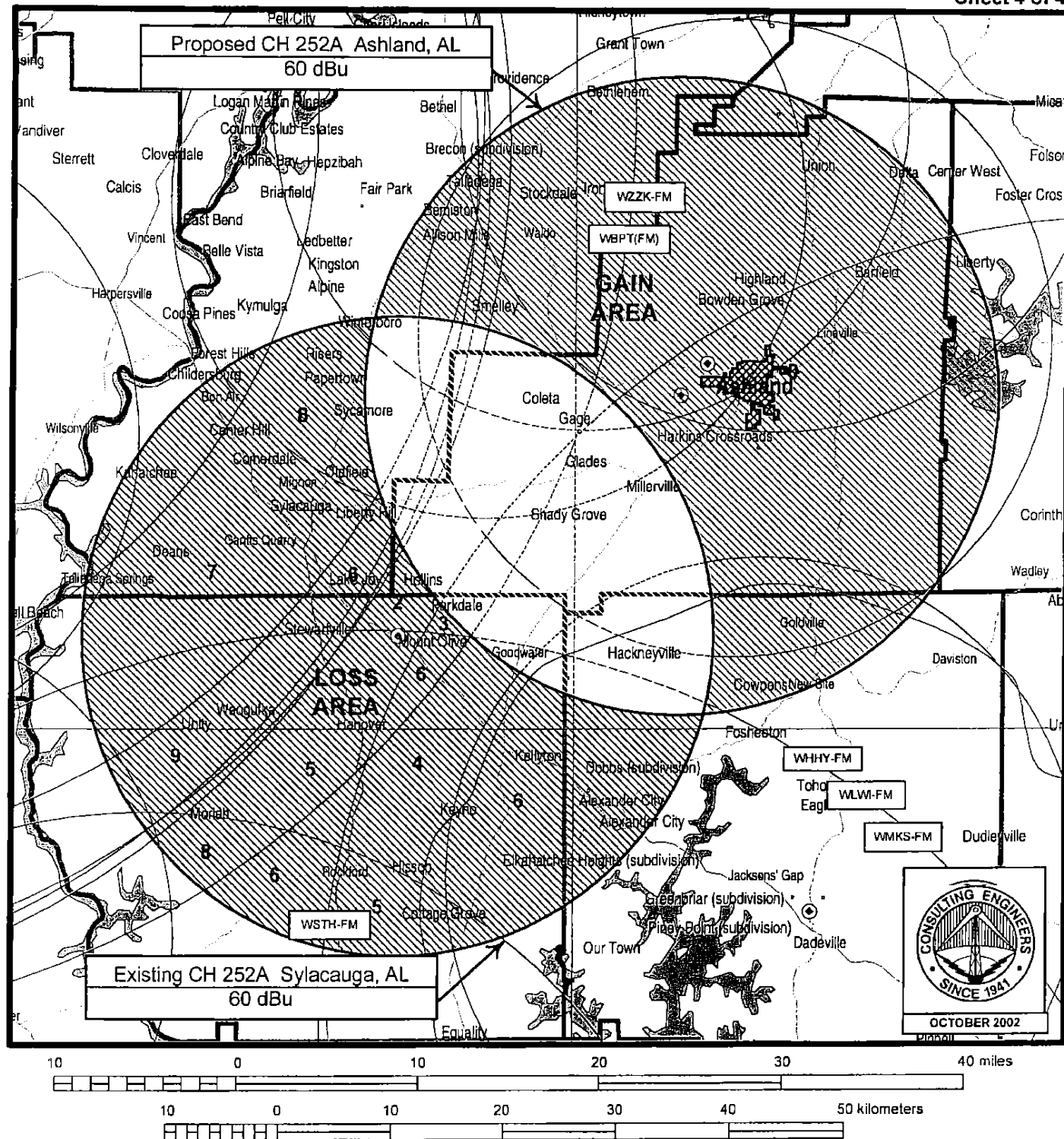


PROPOSED ASHLAND CITY 70 dBu COVERAGE CONTOUR

PETITION FOR RULE MAKING

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SYLACAUGA LOSS AREA OTHER SERVICES

PETITION FOR RULE MAKING

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